

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Monte L. Shular, On Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

v.

LVNV Funding LLC and
Michael J. Scott, PC,

Defendants.

Civil Action No. 4:14-cv-3053

CLASS ACTION

Motion for Class Certification

**ABRAHAM, WATKINS, NICHOLS,
SORRELS, AGOSTO & FRIEND**

800 Commerce Street
Houston, Texas 77002
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Counsel for Plaintiff

Plaintiff and Proposed Class Representative Monte L. Shular, On Behalf of Himself and All Others Similarly Situated, by its counsel, Abraham, Watkins, Nichols, Sorrels, Agosto & Friend (“Counsel”) hereby move this Court for an Order under Federal Rule of Civil Procedure 23:

- Certifying the following proposed Classes:
 - All individuals subject to debt collection by LVNV Funding, LLC between November 8, 2012, and June 1, 2015, in connection with debt originally owned and purportedly purchased from Conn Appliances, Inc. (“Class Period”) and transferred as a part of the November 8, 2012 assignment and sale by and among Conn Appliances, Inc., Sherman Originator III, LLC, Sherman Originator, LLC and LVNV Funding, LLC.;
- appointing Plaintiff as Class Representative;
- appointing Plaintiff’s counsel as Class Counsel; and
- granting such other and further relief as the Court may deem just and proper.

In support of this Motion, Plaintiff submits herewith a Memorandum of Law.

Dated: September 10, 2015

**ABRAHAM, WATKINS, NICHOLS,
SORRELS, AGOSTO & FRIEND**

/s/ Sammy Ford IV

Sammy Ford IV
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Counsel for Plaintiff

Certificate of Service

I hereby certify that a true and correct copy of the foregoing instrument has been served by electronic CM/ECF filing on this the 10th day of September, 2015.

/s/ Sammy Ford IV

Sammy Ford IV